Exhibit 1 Excerpted

Case 1:10-cv-06950-AT-RWL Document 1157-2 Filed 01/07/21 Page 2 of 6 ATTORNEYS' EYES ONLY - CONFIDENTIAL

1	UNITED STATES DISTRICT COURT		
2	SOUTHERN DISTRICT OF NEW YORK		
3	NO. 10-cv-6950-AT-RWL		
4	XX		
5	H. CHRISTINA CHEN-OSTER, :		
6	SHANNA ORLICH; ALLISON GAMBA; : CIVIL ACTION		
7	and MARY DE LUI : DEPOSITION OF:		
8	Plaintiffs, : LLOYD BLANKFEIN		
9	vs. :		
10	GOLDMAN SACHS & CO. and THE :		
11	GOLDMAN SACHS GROUP, INC., :		
12	Defendants. :		
13	XX		
14			
15	COMPUTERIZED TRANSCRIPT		
16	of the stenographic notes of the proceedings in the		
17	above-entitled matter as taken by and before Rosalie A.		
18	Kramm, Certified Shorthand Reporter No. 5469, Certified		
19	Realtime Reporter, taken remotely on November 16, 2020,		
20	commencing at 12:41 p.m.		
21			
22	ATTORNEYS' EYES ONLY - CONFIDENTIAL		
23			
24	Job No. 4340344		
25	Pages 1-167		
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1	questions on where we stand versus peers who have made	14:44:12
2	numerical statements on this topic, we are prepared to	14:44:17
3	say we have conducted an analysis that shows women at the	14:44:20
4	firm on average make 99 percent of what men earn. The	14:44:25
5	underlying issue is underrepresentation of women at more	14:44:32
6	senior levels."	14:44:35
7	Do you see that?	14:44:36
8	A. Yes.	14:44:37
9	Q. What can you tell us about the analysis showing	14:44:38
10	that on average women make 99 percent of what or made	14:44:40
11	99 percent of what men earned at Goldman Sachs?	14:44:44
12	MR. GIUFFRA: Lloyd, I would instruct you not	14:44:49
13	to disclose any privileged communications with anyone you	14:44:51
14	had about that analysis.	14:44:54
15	THE WITNESS: Okay. I'm not sure I get the	14:44:56
16	question. I'm sorry.	14:44:58
17	BY MR. GLACKIN:	14:44:59
18	Q. So this sentence references an analysis showing	14:45:01
19	that women at the firm on average make 99 percent of what	14:45:05
20	men earn. What do you know about that analysis?	14:45:08
21	And if you can only answer the question by	14:45:12
22	revealing privileged information, you should let us know	14:45:13
23	that that's the only way you could answer it, and we'll	14:45:16
24	proceed from there.	14:45:19
25	But if you can answer based on knowledge you	14:45:21
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1	had at the time that is not privileged, or knowledge	14:45:22
2	acquired later that is not privileged, you should let us	14:45:25
3	know, or you should answer the question.	14:45:29
4	A. I I took the assertion as as at face	14:45:31
5	value. I take it now at face value.	14:45:36
6	Q. So nobody ever explained to you what that	14:45:39
7	analysis was?	14:45:41
8	MR. GIUFFRA: Objection to form.	14:45:42
9	THE WITNESS: Well, there I might have	14:45:43
10	gotten if I had gotten an explanation any	14:45:44
11	explanation I had would have come from would have come	14:45:47
12	from a privileged side.	14:45:52
13	BY MR. GLACKIN:	14:45:53
14	Q. So it would have come from by an attorney?	14:45:56
15	Is that what you are saying?	14:46:00
16	A. Yes.	14:46:03
17	Q. And you do you mean an attorney in 2018 or	14:46:04
18	an attorney like Mr. Giuffra in preparation for this	14:46:08
19	deposition?	14:46:12
20	A. I I don't recall. I'm only referring to the	14:46:14
21	origin, 2018.	14:46:17
22	Q. Okay. So you're saying that any explanation	14:46:21
23	you had about this would have come from counsel in 2018,	14:46:23
24	such as, for example, possibly the employment law group?	14:46:26
25	Is that what you're saying?	14:46:29
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1	A. Possibly, yes.	14:46:31
2	Q. You wouldn't have received it you wouldn't	14:46:32
3	have received any explanation about this from Human	14:46:34
4	Capital Management?	14:46:37
5	A. I think the nature of what I'm asserting is	14:46:40
6	that my recollection involves communication from what	14:46:42
7	would be a privileged source.	14:46:47
8	Q. Okay. So you have a your only recollection	14:46:49
9	about what this analysis was is something that you	14:46:53
10	received from a privileged source.	14:46:56
11	A. My the the original question that you	14:47:01
12	asked in terms of investigation and the sourcing of it,	14:47:04
13	the answer is yes.	14:47:07
14	Q. Okay. Can you tell us can you tell us what	14:47:09
15	the source was, the specific name of the attorney or	14:47:12
16	inside versus outside counsel?	14:47:15
17	A. My guess that's part of the whole privilege	14:47:19
18	thing, but, you know other people can advise me	14:47:21
19	otherwise.	14:47:24
20	MR. GLACKIN: Well, Mr. Giuffra will advise	14:47:25
21	you.	14:47:27
22	MR. GIUFFRA: If you can remember the name of	14:47:28
23	the human being who might have spoken to you, you can	14:47:29
24	give the name of the person. If you can't remember the	14:47:31
25	name of the human being, say you can't remember the name	14:47:33
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